

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

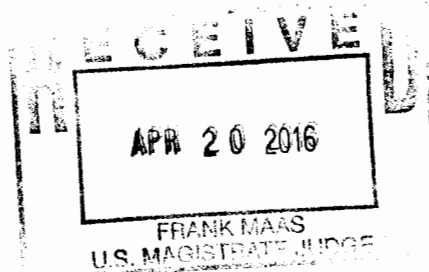
In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley, <i>Co-Chair</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> SIMMONS HANLY CONROY LLP	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

**Via ECF and FedEx**

April 19, 2016

Magistrate Judge Frank Maas  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Room 740  
New York, NY 10007

**MEMO ENDORSED**

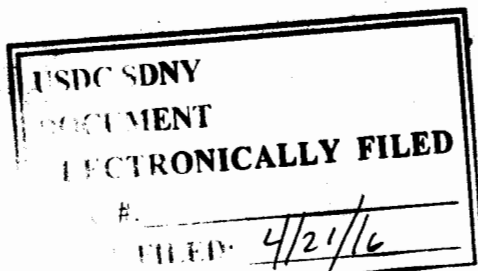
Re: In Re: Terrorist Attacks on September 11, 2001,  
03 MDL 1570 (GBD) (FM)

Dear Judge Maas:

On behalf of the *O'Neill, Ashton, and Federal Insurance* Plaintiffs, I am writing to request the deadline to respond to the *Havlish* counsel's Motion for Creation of a Common Benefit Fund (ECF No. 3235) be extended from April 22, 2016 to May 2, 2016. See ECF No. 3241.

In light of other significant conflicting demands on counsel time in the past ten (10) days, we will be unable to complete the preparation of the appropriate response which the application deserves.

I have repeatedly asked movants' counsel for their position on this request but unfortunately have not received a response.

APPLICATION GRANTED  
SO
  
 Frank Maas, USMJ 4/21/16

Magistrate Judge Frank Maas  
April 19, 2016  
Page 2

Accordingly, in the interest of justice, we are requesting an extension from the present due date until May 2, 2016.

Respectfully submitted,



Jerry S. Goldman  
Anderson Kill PC  
FOR THE O'NEILL, ASTON and FEDERAL  
INSURANCE PLAINTIFFS

cc: The Honorable George B. Daniels (via FedEx)  
All Counsel of Record (via ECF)